

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

ANDRE JEAN-BAPTISTE,

Plaintiff,

Case No.: 15-cv-636

v.

GLK FOODS, LLC,

Defendant.

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**JOINT MOTION TO EXTEND DEADLINE TO COMPLETE FACT DISCOVERY**

The Parties, Plaintiff, Andre Jean-Baptiste as Class Representative, and Defendant, GLK Foods, LLC, by and through their respective undersigned counsel, pursuant to Rule 29, Fed. R. Civ. P., and Rule 26(c), Civil L. R., hereby respectfully request that the Court issue an Order extending the discovery deadline in this matter from July 5, 2016, to October 5, 2016, and state as follows:

1. Under the Court's Scheduling Order dated July 22, 2015, the deadline for completion of fact discovery was set for July 5, 2016.
2. Due to scheduling conflicts of the Parties, there remain several depositions that need to be taken in the next several months.
3. To allow for sufficient time for the Parties to conduct depositions in this matter, and potentially necessary follow-up discovery, the Parties request that the Court grant an extension of time to conclude fact discovery through and including October 5, 2016.
4. The requested extension will not affect any of the other dates set in this matter.
5. The Parties have conferred and jointly request this extension.

**WHEREFORE**, Plaintiff, Andre Jean-Baptiste ass Class Representative, and Defendant, GLK Foods, LLC, respectfully requests this Court enter an Order extending the deadline to complete discovery through and including October 5, 2016, and for such other relief the Court deems appropriate.

Dated this 6th day of July, 2016.

/s/ Gregory S. Schell  
Gregory S. Schell, Esq.  
Florida Bar No. 287199  
MIGRANT FARMWORKER JUSTICE  
PROJECT  
P.O. Box 32159  
Palm Beach Gardens, FL 33420  
Telephone: (561) 582-3921  
E-Mail: greg@floridalegal.org  
Attorney for Plaintiff

/s/ Bradley S. Bell  
BRADLEY S. BELL, ESQ.  
Florida Bar No.: 184306  
BELL LAW GROUP, P.A.  
407 N. Howard Avenue  
Suite 201  
Tampa, FL 33606  
Telephone: (813) 867-4522  
E-Mail: bbell@bbellpa.com  
Attorney for Defendant

**CERTIFICATE OF COUNSEL**

I **HEREBY CERTIFY** that no memorandum or other supporting papers will be filed with this Motion.

/s/ Bradley S. Bell \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that I electronically served the foregoing document on: Gregory S. Schell, Esq. (greg@floridalegal.org) Migrant Farmworker Justice Project, Florida Legal Services, Inc., Post Office Box 32159, Palm Beach Gardens, Florida 33420, this 6th day of July, 2016.

/s/ Bradley S. Bell \_\_\_\_\_

BRADLEY S. BELL, ESQ.

FL Bar No.: 184306

DOUGLAS J. COLLINS, ESQ.

FL Bar No.: 25838

MICHAEL T. RELIHAN, ESQ.

FL Bar No.: 0116053

**BELL LAW GROUP, P.A.**

407 N. Howard Avenue

Suite 201

Tampa, FL 33606

(813) 867-4522 (Ph)

(813) 867-4542 (Fax)

Attorneys for Defendant,

GLK Foods, LLC

bbell@bbellpa.com

dcollins@bbellpa.com

mrelihan@bbellpa.com

Secondary email addresses:

cleavy@bbellpa.com

scordray@bbellpa.com